



Air Quality Permitting Statement of Basis

February 8, 2007

**Tier II Operating Permit
No. T2-060525**

Idaho Power Company, Inc., Salmon

Facility ID No. 059-00007

Prepared by:

TD

Tracy Drouin, Permit Writer
AIR QUALITY DIVISION

FINAL

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. PURPOSE	4
2. FACILITY DESCRIPTION.....	4
3. FACILITY / AREA CLASSIFICATION	4
4. APPLICATION SCOPE	4
5. PERMIT ANALYSIS	4
6. PERMIT CONDITIONS.....	5
7. PUBLIC COMMENT	6
8. RECOMMENDATION	6
9. AIRS INFORMATION.....	6

Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
hp	horsepower
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Available Control Technology
MMBtu	Million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₃	ozone
PM	Particulate Matter
PM ₁₀	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
PTE	Potential to Emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM80	synthetic minor with emissions above 80 T/yr, but less than 100 T/yr for any criteria air pollutant
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	Tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.400 through 410 Rules for the Control of Air Pollution in Idaho (Rules) for issuing Tier II operating permits (Tier II).

2. FACILITY DESCRIPTION

Idaho Power Company, Inc. (Idaho Power) Salmon Substation generates standby power with two diesel-fired 2.75 megawatt (MW) generators which were installed in 1967. The two generators are the only standby power sources at the facility. The two generators cannot carry the full electrical load for Salmon, but are an important factor in maintaining service in support of the main two transmission lines into Salmon.

3. FACILITY / AREA CLASSIFICATION

Idaho Power is classified as SM80 (synthetic minor with emissions above 80 T/yr, but less than 100 T/yr for any criteria air pollutant) facility because, the potential to emit is limited to less than major source thresholds. The AIRS classification is SM80.

The facility is located within AQCR 63 and UTM zone 12. The facility is located in Lemhi County which is designated as unclassifiable for all regulated criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone).

4. APPLICATION SCOPE

Idaho Power has requested to renew its Tier II permit No. 059-00007 for the Salmon Substation. The permit renewal does not involve an increase in emissions.

4.1 Application Chronology

November 17, 2006	DEQ received the application.
December 13, 2006	DEQ declared the application complete

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this Tier II.

5.1 Equipment Listing

Two 2.75-MW generators which operate on ASTM Grade 1 or 2 distillate fuel oil.

<u>Permit Section</u>	<u>Source Description</u>	<u>Emissions Control(s)</u>
3	<u>Generator West</u> Manufacturer: EMD of General Motors Company Model: 20-645E-E4 Rated heat capacity: 26.036 MMBtu/hr Burner type: Internal Combustion Fuels: No. 1 or No. 2 fuel oil	<u>None</u>
3	<u>Generator East</u> Manufacturer: EMD of General Motors Company Model: 20-645E-E4 Rated heat capacity: 26.036 MMBtu/hr Burner type: Internal Combustion Fuels: No. 1 or No. 2 fuel oil	<u>None</u>

5.2 Emissions Inventory

Emission inventory was not provided in the application because there is no emissions increase due to this permit action.

5.3 Modeling

Modeling is not required for this permit action because there is no emissions increase due to this permit action.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this Tier II.

IDAPA 58.01.01.400.....Procedures and Requirements for Tier II Operating Permits

Idaho Power Company, Inc., requested to renew its Tier II operating permit No. 059-00007 issued January 25, 2002. This permit renewal does not result in an increase in emissions.

5.5 Permit Conditions Review

As requested by Idaho Power Company, Inc., this is a Tier II renewal for Permit No. 059-00007 issued January 25, 2007. The renewal permit contains formatting changes and a five year record retention requirement. All other permit conditions stay the same.

5.6 Fee Review

Idaho Power Company Inc., is an SM80 facility. The technical memorandum for Permit No. 059-00007 incorrectly classified the facility as a B (minor source).

Processing fee in accordance with IDAPA 58.01.01.407

Fee received on April 24, 2007.

☒ ☐ \$10,000 – Synthetic minor stationary sources with permitted emissions below major threshold level.

5.7 Regional Review of Draft Permit

The draft permit was made available for regional office review on February 8, 2007. No comments were received.

5.8 Facility Review of Draft Permit

The draft permit was provided for facility review on February 9, 2007. Comments were incorporated into the permit.

6. PERMIT CONDITIONS

As requested by Idaho Power Company, Inc., this is a Tier II renewal for Permit No. 059-00007 issued January 25, 2007. The renewal permit contains formatting changes and a five year record retention requirement. All other permit conditions stay the same.

7. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.404.04, a public comment period is not required for this Tier II permit renewal.

8. RECOMMENDATION

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue a draft Tier II operating permit to Idaho Power Company, Inc.

9. AIRS INFORMATION

The AIRS classification is SM80 and does not require updating, because there are no changes to the emissions limits in the permit, no changes to the applicability of the regulations, and no changes to the area classification.

TD/bf Permit No. T2-060525